UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA 4

IN RE:

Angel Mercado

Felicia Mercado CASE NO. 18-10459-ref

Debtors CHAPTER 13

NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

Take notice that the debtors, Angel and Felicia Mercado, have filed a Motion to Modify Plan Post Confirmation. Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case.

(If you do not have an attorney, you may wish to consult an attorney.)

- 1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before April 26, 2019 you or your attorney must do all of the following:
- (a) File an answer explaining your position at the following location Clerk/U.S. Bankruptcy Court Suite 300, The Madison Building 400 Washington Street Reading, PA 19602. If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and
- (b) Mail a copy to the Movant's attorney: Brenna H. Mendelsohn, Esq. 637 Walnut Street Reading, PA 19601

Also serve the following with a copy of your answer: Scott F. Waterman, Chapter 13 Trustee 2901 St. Lawrence Avenue, PO BOX 4010, Reading, PA 19606.

- 2. If you or your attorney do not take the steps described in paragraphs (a) and (b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.
- 3. A hearing on the motion is scheduled to be held before the Honorable Richard E. Fehling on Thursday, May 2, 2019 at 9:30 a.m. in Courtroom #1, 3rd Floor, The Madison, United States Bankruptcy Court, Reading, Pennsylvania 19601.

Unless the Court orders otherwise, the hearing, on this contested matter will be an evidentiary hearing at which witnesses may testify with respect to disputed material factual issues in the manner directed by Fed. R. Bankr. P.9014(d).

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph (b).

5. You may contact the bankruptcy clerk's office at 610-208-5040 to find out whether the hearing has been cancelled because no one filed an answer.

Dated: April 6, 2019

Respectfully submitted:

/s/ Brenna H. Mendelsohn, Esq.

Brenna H. Mendelsohn, Esq.

Mendelsohn & Mendelsohn, P.C.

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